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*Attorneys for Defendants
Blue Macaw Mexican Restaurant LLC,
Edmon Haddad and Penny Haddad*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KIND MACAYO, LLC, an Arizona limited,
liability company,

Plaintiffs,

VS.

BLUE MACAW MEXICAN RESTAURANT
LLC, a Nevada limited liability company,
EDMON HADDAD, an individual, and
PENNY HADDAD, an individual, and
MACAYO VEGAS, INC., a Nevada
Corporation,

Defendants.

Case No. 2:19-cv-01451-JAD-VCF

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
HADDAD DEFENDANTS TO FILE
RESPONSES TO (i) VERIFIED
COMPLAINT, AND (ii) MOTION
FOR PRELIMINARY INJUNCTION**

(First Request)

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff Kind Macayo, LLC and Defendants Blue Macaw Mexican Restaurant LLC, Edmon Haddad, and Penny Haddad (collectively the “Haddad Defendants”) hereby STIPULATE: (i) to extend the time for the Haddad Defendants to file their response to the Verified Complaint (ECF No. 1); and (ii) to extend the time for the Haddad Defendants to file their response to Plaintiff’s Motion for Preliminary Injunction (ECF No. 4). The Haddad Defendants’ responses to the Verified Complaint are due on either September 11, 12 or 13, 2019 depending on the date they

1 were served with process. The Haddad Defendants' responses to the Motion for Preliminary
2 Injunction are due on September 4, 5 or 6 depending on the date they were served with the Motion.
3 If approved, the forgoing parties have agreed to an approximate two-week extension of time for
4 the Haddad Defendants to file their responses to the Verified Complaint and the Motion for
5 Preliminary Injunction, respectively. Accordingly, the Haddad Defendants' response to the
6 Verified Complaint would be due on **September 27, 2019**, and their response to the Motion for
7 Preliminary Injunction would be due on **September 20, 2019**. The Haddad Defendants agree that
8 Plaintiff's agreement to the foregoing extension of time shall not be used by them to support any
9 defense or argument based on the doctrine of laches. This is the first stipulation seeking to extend
10 the subject deadlines.
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12 The Haddad Defendants submit that good cause exists to approve the requested stipulation
13 as they were served on different dates with Plaintiff's Complaint and Motion such that
14 consolidating the respective response dates promotes efficiency. Additionally, the extension of
15 time will allow the parties to determine whether this matter may be resolved at an early stage of
16 the proceedings.
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The parties submit that the short extensions requested herein are not for purposes of delay.

DATED: September 6, 2019

Respectfully submitted,

CAMPBELL & WILLIAMS

By /s/ J. Colby Williams
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Kind Macayo, LLC

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
Dated: September 6, 2019.